

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOE,

Plaintiff,

vs.

**LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:21-CV-03193-JD

**CONSENT MOTION FOR EXTENSION
OF TIME**

Plaintiff, by and through her undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiff may file a response to Defendant Hammy Media's Motion for Judgment on the Pleadings. (See Dkt. No. 26).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiff to extend the time to file a Response by an additional seven (7) days. The current due date is March 28, 2022. The new due date would be April 4, 2022.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiff, respectfully requests this Court grant Plaintiff's Motion and enter an order extending the time in which he may file a Response by an additional fourteen (14) days.

HAVING SEEN AND AGREED:

BELL LEGAL GROUP, LLC

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)
Joshua M. W. Salley (#13214)
BELL LEGAL GROUP, LLC
219 North Ridge Street
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@edbelllaw.com
jsalley@edbelllaw.com
Counsel for Plaintiff

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted *Pro Hac Vice*)
Liz J. Shepherd (admitted *Pro Hac Vice*)
Jordan A. Stanton (admitted *Pro Hac Vice*)
DOLT, THOMPSON, SHEPHERD & CONWAY, PSC
13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
jstanton@kytrial.com
Counsel for Plaintiff

Metcalf & Atkinson, LLC

/s/ Hannah Rogers Metcalfe

Hannah Rogers Metcalfe, Fed ID. 9943
Metcalf & Atkinson, LLC
1395 South Church Street
Greenville, South Carolina 29605
Attorneys for Defendant Hammy Media LTD

CIAMPA FRAY-WITZER, LLP

Evan Fray-Witzer (pro hac vice application to follow)

CIAMPA FRAY-WITZER, LLP

20 Park Plaza, Suite 505

Boston, Massachusetts 02116

Telephone: 617-426-0000

Facsimile: 617-423-4855

Evan@CFWLegal.com

Attorneys for Defendant Hammy Media LTD

BOSTON LAW GROUP, PC

Valentin D. Gurvits (pro hac vice application to follow)

Frank Scardino (pro hac vice application to follow)

BOSTON LAW GROUP, PC

825 Beacon Street, Suite 20

Newton Centre, Massachusetts 02459

Telephone: 617-928-1804

Facsimile: 617-928-1802

vgurvits@bostonlawgroup.com

frank@bostonlawgroup.com

Attorneys for Defendant Hammy Media LTD

March 23, 2022

Georgetown, SC